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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

YADIRA CONTRERAS, ERICA  
KRONECK,

Plaintiffs,

vs.

HERITAGE UNIVERSITY,

Defendant.

Case No.: 1:22-CV-3034 TOR

PLAINTIFFS' PROPOSED  
EXPERT ILLUSTRATIVE AID

In anticipation of the prehearing conference scheduled from Monday, April  
28, 2025 at 1:00 p.m., Plaintiffs are providing the eight (8) slide that are anticipated  
to be used by Plaintiffs' economic expert, David Solis, regarding his expert  
PLAINTIFFS' PROPOSED ILLUSTRATIVE AID - 1

1 testimony. *See* Fed. R. Evid. 107. Plaintiffs are providing this at this time for  
2 transparency so that the Court and parties can address any concerns or any  
3 objections by the Defendant ahead of time.  
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5  
6 Dated this 25th of April, 2025.

7  
8 CEDAR LAW PLLC

9 s/Lara Hruska

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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing by electronic mail on the date shown below to the following party:

Paul J. Triesch  
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Attorney for Heritage University

Dated this 25<sup>th</sup> day of April 2025.

s/ Sydney Arizona Bay  
Sydney Arizona Bay

# ECONOMIC DAMAGES

DAVID SOLIS, MSF, CVA, MAFF

SOLIS FINANCIAL FORENSICS LLC

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## INFORMATION REVIEWED

- Complaint for Damages dated March 11, 2022
  - Plaintiff's Mediation Brief dated February 23, 2022
  - 2020 AAPA Salary Report
  - Heritage University tuition and fees for Physician Assistant Program
  - Email correspondence from Erica Kroneck
  - Academic and financial plan for Erica Kroneck
  - Heritage University student account information for Erica Kroneck
  - A.T. Still University tuition and fees information
  - Expenses spreadsheet Erica Kroneck
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## INFORMATION REVIEWED (CONTINUED)

- Lease agreement for Erica Kroneck
  - Expense receipts for Erica Kroneck
  - U-Haul receipts for Erica Kroneck
  - IRS Form 1040, U.S. Individual Income Tax Returns for Yadira Contreras for the years 2019 and 2020
  - Academic and financial plan for Yadira Contreras
  - CASPA payments for Yadira Contreras
  - Estimation of damages for Yadira Contreras
  - Heritage University student loans balances for Yadira Contreras
  - South University tuition and fees for Master of Science in Physician Assistant program
  - Heritage University student account information for Yadira Contreras
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## ASSUMPTIONS RE: MS. CONTRERAS' DAMAGES

- Damages period of 1 year based on her delay in graduating from an accredited PA program
  - Employment compensation loss based on actual current salary of \$128,606
  - Wage growth rate based on historical wage growth in the U.S. (3.82%)
  - Differential in tuition and fees based on actual balance of student loans at South University (\$187,661) versus estimated amounts to complete PA program at Heritage University (\$93,951)
  - Outstanding student loans with Heritage University (\$20,574)
  - Application fees incurred
  - Moving costs incurred
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<b>Economic Damages Incurred by Ms. Contreras</b>	<b>Value</b>
Total Compensation Loss	\$ 141,315
Differential in Tuition and Fees	\$ 93,710
Outstanding Student Loans through Heritage University	\$ 20,574
Application Fees	\$ 619
Moving Costs	\$ 560
<b>TOTAL ECONOMIC DAMAGES</b>	<b>\$ 256,777</b>

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## ASSUMPTIONS RE: MS. KRONECK'S DAMAGES

- Damages period of 2 years based on her delay in graduating from an accredited PA program
  - Employment compensation loss based on actual current salary of \$165,000
  - Wage growth rate based on historical wage growth in the U.S. (3.82%)
  - Differential in tuition and fees based on actual balance of student loans at A.T. Still University (\$267,679) versus estimated amounts to complete PA program at Heritage University (\$93,951)
  - Outstanding student loans with Heritage University (\$67,112)
  - Application fees incurred
  - Travel and moving costs incurred
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<b>Economic Damages Incurred by Ms. Kroneck</b>	<b>Value</b>
Total Compensation Loss	\$ 355,941
Differential in Tutition and Fees	\$ 173,728
Outstanding Student Loans through Heritage University	\$ 67,112
Application Fees	\$ 2,932
Travel and Moving Costs	\$ 5,324
<b>TOTAL ECONOMIC DAMAGES</b>	<b>\$ 605,036</b>

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# OPINIONS

- 1. Yadira Contreras incurred economic damages of \$256,777.**
  - 2. Erica Kroneck incurred economic damages of \$605,036.**
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